

Comments to the CALFED Bay-Delta Program Programmatic Draft EIS/EIR  
June 29, 1998

- . To address water quality, health and safety issues, pumping used ag irrigation water back into the Delta must be stopped. What, if anything, is being done about this? Development of other disposal methods? Treatment for some type of recycling? Legislation? If not, why not?
- . As viewed with Dave Samson on May 21st, Old River is significantly wider downstream from West Canal (ie. the vicinity of the Los Vaqueros intake). Will any modeling of flows and velocities be done for levee setbacks on the S/W of Victoria Island across from Widdows/Eucalyptus/King Islands and on Coney Island across from the Forebay? If not, why not? Am I offered assurances that no dredging will be done in West Canal without fortifying Widdows/Eucalyptus/King Islands or that no increases in channel velocities will result from any project component? If not, why not?
- . The technical appendix for the Long-Term Levee Protection Plan details numerous aspects of Delta islands on Excel spreadsheets. Widdows, Eucalyptus and King Islands along with Quinn and Salisbury Islands (to the east of Coney Island) are not included in these lists. Why not? Although not reclamation districts (others included were not), and small in acreage, these and other small islands in the area represent significant amounts of the limited remains of original riparian habitats. Will their habitat values be assessed for special-projects funding? Eucalyptus Island supports active Swainson's Hawk nest sites with young. The Western Pond Turtle colony around King and Eucalyptus Islands numbers in the dozens, more than all other islands listed combined. Special status plants also flourish. Will this data be verified, used or included in assessing the habitat values of these islands for special-projects funding? If not, why not?
- . The proposed low head pumping plant and fish screen facility for the Clifton Court Forebay Intake is a radical departure from previous project proposals. Am I assured there will be a site specific EIS/EIR along with public process for this component? If not, what will be CALFED's environmental justification for CEPA/NEQA? If the current intake design is advanced, will CALFED reverse the location of the fish handling facilities? The habitat value in the space between the levees is greater to the north and the impacts to the islands north of the Forebay would be lessened. Will CALFED assure that vehicular traffic uses the southern access around the Forebay? ISDP mitigation measures proposed the southern access because of Brittscale populations on the N/W perimeter of the Forebay. Will CALFED do the same?

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- . The existing Forebay intake structure has been without one of its five gates for over two years due to a failed inspection. The remaining gates were closed for a good part of the winter and spring due to excessive water and interior levee repairs and rip-raping in the Forebay. What prevents engineers from devising a method to make modifications at the existing intake location, still operate up to current levels and save the enormous expense of a new facility plus obsoleting the old one? The dubious benefits of screening fish in the South Delta get mixed reviews. Screening at the intake would aid in moving the predation activities from inside the structure to the outside (ie. from managed water to unmanaged water). Isn't this merely an expensive agency absolution without solving the problem? Wouldn't it be as effective and cheaper to update the existing Skinner Fish Facility and institute some measures to control the Striped Bass populations in the Forebay? If not, why not?
- . I've always understood the flow control barriers/dams to be a component of the SDWA/DWR water quality lawsuit settlement agreement of 1986. The benefits vs. the impacts of the temporary barriers program has raised issues since its inception. When considering the contents of the undated SDWA letter in <sup>APPENDIX E</sup> NEXT TO LAST the Governor's Flood Emergency Action Team Final Report dated May 10, 1997, isn't it appropriate to re-address/re-negotiate the agreement and look at fixing the channels? If not, why not?
- . The reclamation district maps in the Long-Term Levee Protection Plan do not identify the levees around the outside perimeter of the Forebay. If these are SWP levees, as I've been led to believe, when will they receive badly needed reinforcements? Many spots along Italian Slough and West Canal need attention before next winter and hopefully SWP will be taking care of it soon.
- . Resource Insights directed some efforts to gathering and compiling public input about Delta recreation for ISDP. Will CALFED look to use that information?